

**Lodrigueza, Luis**

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**From:** F. Edward Reynolds <reynolds@reynolds-group.com>  
**Sent:** Friday, September 06, 2013 1:46 PM  
**To:** Lodrigueza, Luis  
**Cc:** Angel Cardoza, Jr.; Lori Tigner  
**Subject:** File #94IC29 Fullerton Business Park North, 1551 East Orangethoripe

Hi Mr. Lodrigueza,

Thanks for meeting with Angel and me last Friday, August 30 in person at your office. I told you I would send you this e-mail for you to confirm our understanding in moving forward.

Please reply back to me when you receive this. Thank you.

Our meeting was to clarify in detail the pathway to receiving a "No Further Action Letter" (NFA) from the Orange County Health Care Agency (OCHCA) on the subject case file. We wanted to speak about our recent correspondences by e-mail and codify with specificity your and our understanding of the pathway to NFA.

You told us that indoor air sampling trumps all other sampling. No sub slab sampling of any kind is necessary if we proceed directly to indoor air sampling and the results are favorable. (This is similar to the The Reynolds Group's plan you approved advance case closure in late 2011.) You reminded us that indoor air sampling is the ultimate test of vapor intrusion from contamination below slabs.

If two successful indoor air sampling events, six months apart demonstrate acceptable levels of tetrachloroethylene (PCE) then the OCHCA will issue the NFA. No further subsurface sampling is required if indoor air sampling results are favorable. We explained to you that we did our own independent check with at least one sample in 2011 and it was "clean". We did not report it to you because it was not done to full protocols.

With your consent to this e-mail, The Reynolds Group will perform the first round of Indoor Air Sampling in September, 2013. The indoor air sampling procedures and analytical methodology will, as you have requested, be performed to the general requirements of the October, 2011 Department of Toxic Substances Control Agency "Guidance For the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air (Vapor Intrusion Guidance)."

The Reynolds Group will collect eight samples inside the building and three samples outside the building outside of operating hours. The duration of the sampling will be eight hours. Angel Cardoza, Jr. of The Reynolds Group will perform our fieldwork and sample collection. Angel will coordinate your site visit to see the setup in advance. We understand that you would prefer to be at the property at the end of the your work day on the day of sampling to review the setup and review the sampling protocols.

The Reynolds Group will use Jones Environmental Laboratory (JEL) to provide us with clean summa canisters, provide the laboratory analytical work and results.

We are working through Site access issues. But here is the general plan:

1. on the day before the work, meet with the Site operator a day before the scheduled work to do a review property operations and ask Mr. Wall to cap all open containers and review to confirm no chemical compounds like those we have been remediating (PCE) are present
2. in mid-afternoon on the day of the work, meet with Luis Lodrigueza on the property to go over the sampling plan

3, on the day of the work, have site operator close all of the access doors at the end of the evening shift so we can do our sampling with the doors closed

4. TRG and Site operator will establish a way to exit the property after our sampling is completed in the wee morning hours (sampling from 8pm to 4am?) and leave the property secure

5. TRG will perform the sampling, have the samples analyzed by a Jones Environmental and prepare a report

Thanks, Luis. Please get back to me with your approval, then we will coordinate the Site operators schedule and yours to reach a mutually acceptable date for sampling in the near future.

I apologize for the stop and go on this work, but here we go again.  
Thanks for responding.

Thank you.

Best Regards,  
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